



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



321560

OCT 03 2002

REPLY TO THE ATTENTION OF

SR-6J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

RESPONDENTS:

See Attached Distribution List

Re: Sauget Area 2 Site - Groundwater Operable Unit  
Sauget, Illinois  
Notice under Section 122(a) of CERCLA and  
Unilateral Administrative Order

To the Addressees on the attached Distribution List:

This letter notifies you that the United States Environmental Protection Agency ("U.S. EPA") has determined not to use special notice procedures pursuant to Section 122(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended ("CERCLA"), at the above referenced site regarding the Remedial Design/Remedial Action ("RD/RA") for the Sauget Area 2 Site Groundwater Operable Unit ("OU"). The OU is part of a larger Superfund Site known as Sauget Area 2 (the "Site").

As indicated in the Special Notice letter regarding conditions at the Area 2 Site sent on June 23, 2000, to Area 2 potentially responsible party ("PRPs"), U.S. EPA has evaluated volumes of existing information in connection with its investigation of the Site. Additional information about the Site has been gathered during the course of the ongoing Sauget Area 2 and recently completed Sauget Area 1 Remedial Investigation ("RI") process and through other efforts. As a result of this information, you or your company have been identified as one of the parties that is potentially responsible for contributing hazardous substances to the Sauget Area 2 Site Groundwater OU. U.S. EPA has information indicating that you may be a PRP as defined at Section 107(a) of the CERCLA, 42 U.S.C. § 9607(a), with respect to hazardous substances associated with this OU. The OU only encompasses the groundwater contamination releasing to the Mississippi River adjacent to Site R and the resulting impact area in the Mississippi River. The U.S. EPA expects to act quickly to initiate remedial activities at this OU.

On September 30, 2002, the U.S. EPA selected an interim remedy for the OU pursuant to its authority under CERCLA. The State of Illinois has indicated its intention to concur with the selected remedy. The selected remedy includes the installation of a 3,500 foot long, "U"-shaped, fully penetrating, jet grout barrier wall to be installed between the downgradient boundary of Sauget Area 2 Site R and the Mississippi River to abate the release of impacted groundwater. Three partially penetrating groundwater recovery wells will be installed inside the "U"-shaped barrier wall to control groundwater moving to the wall. Groundwater quality, groundwater level, sediment and surface water monitoring will be used to ensure acceptable performance of the interim groundwater remedy. Extracted groundwater will be treated and ultimately discharged to the Mississippi River in compliance with all applicable or relevant and appropriate requirements.

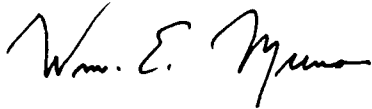
Section 122(a) of CERCLA requires that U.S. EPA notify PRPs whenever it determines not to use the settlement procedures set forth in Section 122 of CERCLA. The U.S. EPA has decided not to invoke the settlement procedures under Section 122 of CERCLA because it believes they will not expedite remedial action at the OU. In this case, U.S. EPA believes that remedial action can begin this year only if U.S. EPA issues a Unilateral Administrative Order ("UAO") for the RD/RA in short order. Solutia, Inc., which is one of the generators who sent waste to the Site, has indicated that in light of ongoing discussions and the proposed remedial schedule, the statutory settlement procedures are not necessary to expedite clean-up.

Therefore, enclosed please find a UAO issued by the U.S. EPA under Section 106 of the CERCLA, 42 U.S.C. Section 9601, et seq. Please note that the Order allows an opportunity for a conference if requested within ten (10) days after the date of issuance of this Order and an opportunity to submit comments on or before the effective date of this Order which is thirty (30) days after the date of issuance.

The decision not to use the special notice procedures does not preclude you from entering into discussions with U.S. EPA regarding your participation in response activities for the OU. This decision simply means that U.S. EPA will not use the special notice procedures to govern any future discussions. U.S. EPA encourages any offers regarding settlement of this matter and participation in response activities. As indicated above, Solutia is already cooperating with U.S. EPA in expediting cleanup at the OU. If you are interested in joining these efforts, you may want to contact Linda Tape, Esq., who is representing Solutia in these matters, at (314)480-1839.

If you have any questions concerning the remedial actions described herein, please contact Mike Ribordy, Remedial Project Manager, at (312) 886-4592. If you have any legal questions, please contact Thomas Martin, of the Office of Regional Counsel, at (312) 886-4273.

Sincerely,

A handwritten signature in black ink, appearing to read "Wm. E. Munro". The signature is fluid and cursive, with the first name "Wm." and last name "Munro" clearly distinguishable.

William E. Munro, Director  
Superfund Division  
U.S. Environmental Protection Agency, Region 5

Enclosures

cc: Renee Cipriano, Director  
Illinois EPA

bcc: Docket Analyst, ORC (C-14J)  
Thomas Martin, ORC (C-14J)  
Mike Ribordy, SFD (SR-6J)  
Stuart Hill, Public Affairs (P-19J) w/out attachments  
Sandra Bron, Illinois EPA  
Michael Henry, Illinois DNR  
Kevin de la Bruere, USFWS  
Mark Bedford, SFPMB, SMR-7J  
Karen Torrent, DOJ

PRP's Who Received UAO in 10/02 Mailing	PRP's who did not receive UAO in the 10/02 mailing because of out-of-date address or they are additional PRP's
	A-1 Oil Corporation No information in ChoicePoint
1. Aalco Wrecking & Supply Co.	Abco Trash & Equipment Company c/o Melvin Heller, Registered Agent 11330 Olive Blvd. St. Louis, MO 63141-7149 and home number: Melvin Heller Registered Agent Abco Trash & Equipment Company 40 Rio Vista St. Louis, MO 63125
2. Abco & Southern Railroad	Ajax Hickman Hauling No available records to check in Choice Point
	Ameren CIPS/Ameren PO Box 66149 MC210 Jefferson, IL 63166-6149
3. Alton & Southern Railroad	Atlas Service Co. 3871 Ridgeview Road Edwardsville, IL 62025-7731 (618) 656-0303
4. AMAX Zinc	Banjo Iron 150 Banjo Drive Crawfordsville, IN 47933
5. American Zinc Company	Baur Equipment Rental Company Roy Bauer 3936 Mississippi Cahokia, IL 62206-1060
	BASF Inmont Division 6700-8th St Buena Park, CA 90620-1097 (714) 521-6085
6. Armstrong Teasdale, LLP	Beckr Iron & Metal Inc P.O. 170 Marshall, MN (507) 537-0571
7. Bi-State Transit Company	Belleville Concrete Construction Co. 2700 S. Belt W Belleville, IL 62226-6776 (618) 233-7286

8.	Blue Tee Corporation	Boyer Sanitation 17884 Rockmar Lane Grass Valley, CA 95949 Filed Chapter 7 Bankruptcy 4/10/98	
9.	Browning Ferris Industries	Thomas Byrd Too many Thomas Byrd's in Choice Point (which one?)	
10.	Cargill Inc.	C & E Hauling No information in ChoicePoint	
11.	Cerro Copper Products	Clayton Chemical 13310 S. Figueroa St Los Angeles, Ca 90061-1142 (310-538-9530	
12.	Chemical Waste Management	Corkery Fuel Company No records available in ChoicePoint	
13.	David Hauling	Dore Wrecking Co. Administrative Dissolution 1/1/1970 Past Registered Agent: Edward Siebert 110 N Lake Michigan City, IN 46000-9009	Past President: Arthur P. Dore 5412 Osage Avenue Portage, IN 46368
		The Dow Chemical Company (debtor) 2030 Dow Centre Midland, MI 48674 Court: JEFFERSON COUNTY COURT County: JEFFERSON, MO Tax Authority: DEPARTMENT OF REVENUE	
		Emerald Environmental Group LLC fka: Clayton Chemical 2705 Old Highway 40 SU. 303A Verdi, NV 89439	
		03265551 ETHYL CORPORATION (Debtor) 30 S 4TH ST RICHMOND, VA 23219 Document Type: STATE TAX WARRANT Filing Date: 05/05/1999 Amount: \$436 Court: INDIANAPOLIS CIR	

14.	Dennis Chemical Co Inc.	<p>Evans Brothers Construction (fictitious registration) 7/22/1960 21 Kirkham Dr Rt. 2 Box 225 Arnold, MO (this address was active in 1960)</p> <p>Possible contacts &amp; addresses: Evans Brothers Construction PO Box 5 Trenton MO 64683</p> <p>Evans Bros Excavating Inc. 290 Riggs Dr East Palestine, OH 44413-1402</p> <p>Property address for Evans Bros Excavating 2618 Bacon Avenue East Palestine, OH 44413-1402</p>
		<p>Edgemont Construction (Certificate of Recision filed) F00164611 Corporation Type: FOREIGN CORPORATION Annual Report Filed: 08/08/1984 Name effective date: 10/01/1973 Sub-Status: Filed an application for certificate of withdrawal Tax Year Begins: 02/01</p>
		<p>Ethyl Corporation fka: Edwin Cooper Corporation</p>
		<p>Ethyl Petroleum Additives AKA: Edwin Cooper c/o CT Corporation 208 S. LaSalle St Chicago, IL 60604-1135</p> <p>also:</p> <p>Shell Chemical Division Shell Oil PO Box 2463 Houston, TX 77252 and</p> <p>Ethyl Petroleum Additives Monsanto Ave Sauget, IL 62201</p>
15.	Eagle Marine Industries Inc	<p>Finer Metals Company No information in ChoicePoint</p>
16.	Exxon Mobil Corporation	<p>Fish Disposal Merged into another company</p>
17.	Fruin-Colnon Corporation	<p>Gibson Hauling Gibsons Transport &amp; Hauling Philadelphia, PA 19102 (215) 549-3477</p>

	Gold Fields American Corporation Purchased and bought property thru Lake Fields Development Inc. 735 Lakes Edge Drive Oxford, MI 48371-5232
18. Hilltop Hauling Inc.	Huffmeir Brothers Arthur Huffmeier 2952 E. Springersville Road Connersville, IN 47331-8204 (765) 825-9592
19. Jerry Russell Bliss	Hunter Packing Incorporated 1948 AKA: PACO, INC. Government Office St. Louis, MO 63101 (314) 621-4095
20. Kerr McGee Chemical Corporation	Disposal Service Co c/o Sidney Grossman, Agent 2 Lakeside Green Drive St. Louis, MO 63124-1517 (314) 993-2759
21. Mallinckrodt	St. Louis Grain Company owns or owned property located at: 1 E. Grand Avenue, Decatur IL 62525-1820 and is Associated with Archer Daniels Midland Co.  Contact: Paul Caswell, ADM Director of New Technology Bioproducts Division Box 1470 Decatur, IL 62525 Tel: 217-362-3969 Fax: 217-424-4567 Voice Mail: 800-238-6171, extension 3105 E-mail: caswell@ltc.admworld.com
	Phelps Dodge Industries Inc (debtor) 2131 S Coliseum bv Fort Wayne, IN 46803 State Tax Warrant Filing Date: 03/10/1997 Amount: \$119 Court: ALLEN CIRCUIT COURT County: ALLEN STW, IN Tax Authority: DEPARTMENT OF REVENUE Release Date: 09/29/1998
	Mobile Oil Corporation PO Box Dallas, TX 75221-0290



22.	Midwest Rubber Reclaiming	Peavey Co. (Owns property in Alton, IL) 1 Con Agra CC3628 DR APT Omaha, NE
23.	Monsanto Company	Pillsbury Co. <b>No Corporate Address</b> - acquired by Kaufman Feiner, et al, LLP Also Property Ownership in Kane County, IL and St. Louis, MO Chicago Title Insurance Co. holds the Titles in Illinois Kaufmann, Feiner, Yamin, Gildin & Robbins LLP 777 Third Avenue New York, NY 10017 Phone: (212)755-3100
24.	Onyx Waste Services Inc. AKA: Able Sewer & Plumbing	Crown Cork & Seal Crown Cork & Seal Technologies 1 Crown Way Philadelphia, PA 19154-4501 They are also property owners
25.	Patgood Illinois Inc.	Century Electric Company No address information located in ChoicePoint
26.	Phillips Pipe Line Co.	Century Foundry No records in ChoicePoint
27.	Rogers Cartage Company	Circle Packing No records in ChoicePoint
28.	Sauget Sanitary Development & Research Association	Con Agra 3353 Michelson Dr Irvine, CA 92612-0651 Phone:(949)437-1000 They are also property owners 2010 Taney St Kansas City, MO 64116-3235
29.	Service America Corporation	Dotson Dispose All Service No records located in ChoicePoint
		Arthur Huffmeir 620 Malvern Rd Hot Springs AR  or: 2952 E. Springersville Rd. Connersville, IN 47331-8204 765-825-9592
30.	Solutia	Hilltop Hauling No records located in ChoicePoint

31.	St. Louis Downtown Airport AKA: Bi-State Airport	Midwest Sanitation 906 W 9 <sup>th</sup> St Pella, IA 50219 also: c/o Pella State Bank 500 Oskaloosa St Pella, IA 50219
32.	U.S. Paint Corp. AKA: Glidden	Obear Nester Glass Company c/o Patgood Illinois Inc. CT Corporation, Registered Agent 208 S. LaSalle St. Chicago, IL 60604 also: Obear-Nester Glass Company 20 <sup>th</sup> St. & Broadway East St. Louis, IL 62205
33.	Union Electric Company	National Vendor Services 2201 Royal Lane Suite 230 Irving, TX 75063  Registered Agent: authorization date 11/6/2000 Capitol Corporate Services Inc 300-B east High St Jefferson City, MO 65101
		Olin Corporation 501 Merritt 7 Norwalk, CT 06856
34.	Village of Cahokia	Pharmacia Corporation AKA: Monsanto Co. PHARMACIA & UPJOHN COMPANY 7000 PORTAGE RD KALAMAZOO, MI 49001-0102  Address of property owned by Pharmacia & Upjohn Co. 6655 Troost Avenue Kansas City, MO 64131-1244
35.	Weise Planning & Engineering	